UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

Laurie Ortolano,)
Plaintiff,)
v.) Civil Action No. 1:22-cv-00326-LM
The City of Nashua, et al., Defendants.)))
)

MAYOR JAMES DONCHESS AND CHIEF FINANCIAL OFFICER JOHN GRIFFIN'S MOTION FOR JUDGMENT ON THE PLEADINGS

Defendants James Donchess, Mayor of the City of Nashua, New Hampshire, and John Griffin, Chief Financial Officer ("CFO") of the City of Nashua, New Hampshire (together, "Defendants"), by counsel and pursuant to Rule 12(c) of the Federal Rules of Civil Procedure ("FRCP"), respectfully submit their Motion for Judgment on the Pleadings. In support, Defendants respectfully refer the Court to the accompanying Memorandum of Law and exhibits.

Respectfully submitted,

JAMES DONCHESS, MAYOR OF THE CITY OF NASHUA, NEW HAMPSHIRE JOHN GRIFFIN, CHIEF FINANCIAL OFFICER OF THE CITY OF NASHUA, NEW HAMPSHIRE

By Their Attorneys,

RATH, YOUNG AND PIGNATELLI, PC

One Capital Plaza Concord, NH 03301 (603) 226-2600

/s/ Adam B. Pignatelli

Dated: 1/11/23

Michael A. Pignatelli, NH Bar #2026 map@rathlaw.com Adam B. Pignatelli, NH Bar #20211

abp@rathlaw.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Motion, the accompanying Memorandum of Law, and exhibits were served on all counsel of record through the Court's electronic filing system.

Dated: 1/11/23 /s/ Adam B. Pignatelli
Adam Pignatelli